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Attorneys for Greg Vartanian, Plaintiff

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**GREG VARTANIAN, on behalf** §  
**of himself and all others similarly situated,** §

**of himself and all others similarly situated, §**

**Plaintiffs, §**

**VS.**

**NATIONWIDE LEGAL, INC.,** §  
**NATIONWIDE LEGAL, LLC, and** §  
**DOES 1-100, inclusive.** §

**NATIONWIDE LEGAL, LLC, and**

**DOES 1-100, inclusive.** **§**

**Defendant.** §

**Case No. 3:12-cv-00691-EMC**

## JOINT STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINES

## ORDER TO EXTEND DEADLINES

Plaintiff, Greg Vartanian, individually, and on behalf of putative class members (“Plaintiffs”), and Defendants, Nationwide Legal, Inc. and Nationwide Legal, LLC (“Defendants”), through their undersigned attorneys, stipulate and respectfully request that this Court approve an extension of time for Plaintiff to file his FLSA and Rule 23 Motion for Class Certification. As grounds for this extension, the parties state as follows:

(“Plaintiffs”), and Defendants, Nationwide Legal, Inc. and Nationwide Legal, LLC

(“Defendants”), through their undersigned attorneys, stipulate and respectfully request that this

Court approve an extension of time for Plaintiff to file his FLSA and Rule 23 Motion for Class

**Certification.** As grounds for this extension, the parties state as follows:

1. On July 11, 2012 the parties filed their Joint Case Management Statement (D.E. 40) wherein Plaintiff requested that the court consider the issue of class certification on or before November 16, 2012, that any opposition be due 30 days after filing, and Plaintiff's reply be due 15 days thereafter.

1           2.       The court entered Civil Minutes on July 16, 2012 (D.E. 41) setting a further Case  
2 Management Conference and hearing on FLSA and Rule 23 class certification for December 7,  
3 2012.  
4

5           3.       The parties have exchanged discovery requests; however, due to case conflicts, as  
6 well as serious health problems within the Plaintiff's counsel's family, the parties need additional  
7 time to complete discovery for purposes of class certification.  
8

9           4.       Currently, a hearing is set on class certification for December 7, 2012 with  
10 Plaintiff's class certification brief due 35 days prior. The parties jointly stipulate and request the  
11 deadline for filing a motion for class certification be enlarged to February 23, 2013 in order to  
12 address conflicts and the holiday season. The parties likewise request the Court extend the  
13 related deadlines a like number of days.  
14

15           **WHEREFORE, PREMISES CONSIDERED**, the parties stipulate to extend the time to  
16 file and serve Plaintiff's FLSA and Rule 23 Motion for Class Certification to February 23, 2013  
17 and respectfully request the Court enter an order accordingly.

18 Dated: October 23, 2012

Respectfully submitted,

19  
20           **THE COCHRAN FIRM, LLC**

21           /s/ Robert J. Camp

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*Attorneys for Defendants*

**NATIONWIDE LEGAL, INC. and**

**NATIONWIDE LEGAL, LLC**

IT IS SO ORDERED that Plaintiff's class certification brief shall be filed by February 23, 2013. The motion will be heard on April 4, 2013 at 1:30 p.m. The December 7, 2012 case management conference is reset for Tuesday December 11, 2012 at 10:30 a.m., and an updated joint CMC statement shall be filed by December 4, 2012.

Edward M. Chen

United States District Judge

